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March 15, 2018

The Honorable Ann Y. Shields
United States Magistrate Judge
United States District Court, E.D.N.Y.

Re: *Angela Tsakales v. HJM 447, LLC and Bow Tie Cinemas, LLC*
Civil Action No.: 2:16-cv-06669 (JFB)(AYS)

Dear Judge Shields:

As required by Your Honor's Feb. 12, 2018 Order, we respectfully submit this Joint Status Report on behalf of all parties.

The parties have had additional communications regarding settlement, but to date there is no agreement as to settlement. As such, the parties respectfully request the Court "so order" the following discovery plan¹, so that thereafter the parties can be ready for dispositive motion practice or trial.

The Parties shall exchange Initial Disclosures, pursuant to Rule 26(a)(1), Fed. R. Civ. P., by March 29, 2018 (fourteen days from March 15, 2018, the date of this Joint Status Report).

All fact discovery shall be completed no later than July 13, 2018 (one hundred twenty days from March 15, 2018, the date of this Joint Status Report).

- a. Initial requests for production of documents to be served by April 16, 2018
- b. Interrogatories to be served by April 16, 2018.
- c. Requests to Admit to be served no later than June 13, 2018.
- d. Depositions to be completed by July 6, 2018.

All expert discovery shall be completed no later than August 27, 2018 (forty-five days after the completion of fact discovery). The parties shall meet and confer on a schedule for expert disclosures, including reports, production of underlying documents and depositions, no later than June 13, 2018 (30 days prior to the completion of fact discovery).

Respectfully,

/s/

Adam S. Hanski, Esq.

¹ Based on the status of this case, the parties have not utilized the Discovery Plan Worksheet contained in Your Honor's Individual Rules of Practice.